

To: Baron, Adam

Subject: CCDS and CAFO for Hanford (WA7890008967), 10-2013-0113

Good afternoon Adam!

This is a friendly reminder that I need the CCDS and a copy of the CAFO as soon as possible for Hanford (WA7890008967), 10-2013-0113.

Thank you!

Jo

Jordana Jiles

RCRA Data Manager

Regional Compliance Screener

U.S. EPA Region 10, OCE-127

1200 Sixth Avenue, Suite 900

Seattle, Washington 98101

jiles.jordana@epa.gov

Phone: (206) 553-0309

Schanilec, Kevin

From: Baron, Adam
Sent: Tuesday, August 13, 2013 1:29 PM
To: Schanilec, Kevin
Subject: RE: CCDS and CAFO for Hanford (WA7890008967), 10-2013-0113

That would be great.

Adam Baron

Environmental Protection Specialist
U.S. EPA, Region 10 (OWW-136)
1200 Sixth Avenue, Suite 900
Seattle, WA 98101
(206) 553-6361
baron.adam@epa.gov

From: Schanilec, Kevin
Sent: Tuesday, August 13, 2013 1:14 PM
To: Baron, Adam
Subject: RE: CCDS and CAFO for Hanford (WA7890008967), 10-2013-0113

We're going out there next week, so I can talk to Ecology and make sure they have the closure plans in hand. I'll ask about the check...

Kevin Schanilec
Senior Enforcement Engineer
EPA Region 10 (OCE-127)
1200 Sixth Avenue, Suite 900
Seattle, WA 98101
206-553-1061

From: Baron, Adam
Sent: Tuesday, August 13, 2013 10:17 AM
To: Jiles, Jordana
Cc: Schanilec, Kevin
Subject: RE: CCDS and CAFO for Hanford (WA7890008967), 10-2013-0113

Kevin –

I need to verify the compliance pieces on Hanford before I can finalized the CCDS, such as date payment received and if they've complied with getting the closure plans to Ecology. I'm in the rest of the week. Let's chat.

Adam Baron

Environmental Protection Specialist
U.S. EPA, Region 10 (OWW-136)
1200 Sixth Avenue, Suite 900
Seattle, WA 98101
(206) 553-6361
baron.adam@epa.gov

From: Jiles, Jordana
Sent: Tuesday, August 06, 2013 3:30 PM

Schanilec, Kevin

From: Boyd, Andrew
Sent: Friday, August 16, 2013 1:56 PM
To: Zelen, Benjamin J
Cc: Williamson, Barbara D; Carosino, Robert M; Schanilec, Kevin
Subject: Hanford CAFO Docket # RCRA-10-2013-0113

Ben

The program office and regional hearing clerk have not received notice of the payment of the penalty due under the above referenced CAFO. Paragraph 4.7 of the CAFO requires DOE to provide notice/copies of payment to the regional hearing clerk and to Scott Downey. Please advise.

Thanks

Andy

Andrew Boyd
U.S. EPA, Region 10
Tel: (206) 553-1222
boyd.andrew@epa.gov

SENSITIVE COMMUNICATION INTENDED ONLY
FOR USE OF RECIPIENTS NAMED ABOVE

Schanilec, Kevin

From: Schanilec, Kevin
Sent: Wednesday, August 21, 2013 2:09 PM
To: Boyd, Andrew
Subject: RE: Hanford CAFO Docket # RCRA-10-2013-0113

Hi Andy:

Any response on this?

Tx - Kevin

Kevin Schanilec
Senior Enforcement Engineer
EPA Region 10 (OCE-127)
1200 Sixth Avenue, Suite 900
Seattle, WA 98101
206-553-1061

From: Boyd, Andrew
Sent: Friday, August 16, 2013 1:56 PM
To: Zelen, Benjamin J
Cc: Williamson, Barbara D; Carosino, Robert M; Schanilec, Kevin
Subject: Hanford CAFO Docket # RCRA-10-2013-0113

Ben

The program office and regional hearing clerk have not received notice of the payment of the penalty due under the above referenced CAFO. Paragraph 4.7 of the CAFO requires DOE to provide notice/copies of payment to the regional hearing clerk and to Scott Downey. Please advise.

Thanks
Andy

Andrew Boyd
U.S. EPA, Region 10
Tel: (206) 553-1222
boyd.andrew@epa.gov
SENSITIVE COMMUNICATION INTENDED ONLY
FOR USE OF RECIPIENTS NAMED ABOVE

Thanks
Andy

Andrew Boyd
U.S. EPA, Region 10
Tel: (206) 553-1222
boyd.andrew@epa.gov

SENSITIVE COMMUNICATION INTENDED ONLY
FOR USE OF RECIPIENTS NAMED ABOVE

Schanilec, Kevin

From: Boyd, Andrew
Sent: Thursday, August 22, 2013 8:00 AM
To: Schanilec, Kevin
Subject: FW: Hanford CAFO Docket # RCRA-10-2013-0113

It looks like they paid. I'll let you know as soon as get confirmation from Candace.

From: Boyd, Andrew
Sent: Thursday, August 22, 2013 7:58 AM
To: Smith, Candace
Subject: FW: Hanford CAFO Docket # RCRA-10-2013-0113

Candace – can you confirm that payment was made?

From: Zelen, Benjamin J [<mailto:benjamin.zelen@rl.doe.gov>]
Sent: Monday, August 19, 2013 8:38 AM
To: Boyd, Andrew
Subject: RE: Hanford CAFO Docket # RCRA-10-2013-0113

It was paid on July 11, 2013.

Consent Agreement and Final Order (CAFO), Docket No.: RCRA-10-2013-0113, effective June 26, 2013
\$136K Penalty - logged into STARS on 7/9/13 and paid on 7/11/13

Confirmed with USEPA in Cincinnati today – payment was posted on July 11, 2013 (due date was actually July 26, 2013).

Benjamin Zelen
Attorney
Office of Chief Counsel
U.S. Department of Energy
(509) 376-0815

The information contained in this e-mail message may be privileged, confidential and protected from disclosure under the attorney-client privilege or work product doctrine. Please limit dissemination in order to preserve its privileged and confidential nature. If you are not the intended recipient, any dissemination, distribution or copying is strictly prohibited.

From: Boyd, Andrew [<mailto:Boyd.Andrew@epa.gov>]
Sent: Friday, August 16, 2013 1:56 PM
To: Zelen, Benjamin J
Cc: Williamson, Barbara D; Carosino, Robert M; Schanilec, Kevin
Subject: Hanford CAFO Docket # RCRA-10-2013-0113

Ben
The program office and regional hearing clerk have not received notice of the payment of the penalty due under the above referenced CAFO. Paragraph 4.7 of the CAFO requires DOE to provide notice/copies of payment to the regional hearing clerk and to Scott Downey. Please advise.

Cc: Williamson, Barbara D; Carosino, Robert M; Schanilec, Kevin
Subject: Hanford CAFO Docket # RCRA-10-2013-0113

Ben

The program office and regional hearing clerk have not received notice of the payment of the penalty due under the above referenced CAFO. Paragraph 4.7 of the CAFO requires DOE to provide notice/copies of payment to the regional hearing clerk and to Scott Downey. Please advise.

Thanks
Andy

Andrew Boyd
U.S. EPA, Region 10
Tel: (206) 553-1222
boyd.andrew@epa.gov

SENSITIVE COMMUNICATION INTENDED ONLY
FOR USE OF RECIPIENTS NAMED ABOVE

1		\$136,000.00	\$136,000.00	\$0.00	\$136,000.00	0.000	42 - Fines, Penalties
---	--	--------------	--------------	--------	--------------	-------	-----------------------

Document Activity:

Candace H. Smith
Administrative Assistant / Management Analyst
1200 Sixth Avenue, Suite #900
ORC-158
Seattle, WA 98101
(206) 553-6524

From: Boyd, Andrew
Sent: Thursday, August 22, 2013 7:58 AM
To: Smith, Candace
Subject: FW: Hanford CAFO Docket # RCRA-10-2013-0113

Candace – can you confirm that payment was made?

From: Zelen, Benjamin J [<mailto:benjamin.zelen@rl.doe.gov>]
Sent: Monday, August 19, 2013 8:38 AM
To: Boyd, Andrew
Subject: RE: Hanford CAFO Docket # RCRA-10-2013-0113

It was paid on July 11, 2013.

Consent Agreement and Final Order (CAFO), Docket No.: RCRA-10-2013-0113, effective June 26, 2013
\$136K Penalty - logged into STARS on 7/9/13 and paid on 7/11/13

Confirmed with USEPA in Cincinnati today – payment was posted on July 11, 2013 (due date was actually July 26, 2013).

Benjamin Zelen
Attorney
Office of Chief Counsel
U.S. Department of Energy
(509) 376-0815

The information contained in this e-mail message may be privileged, confidential and protected from disclosure under the attorney-client privilege or work product doctrine. Please limit dissemination in order to preserve its privileged and confidential nature. If you are not the intended recipient, any dissemination, distribution or copying is strictly prohibited.

From: Boyd, Andrew [<mailto:Boyd.Andrew@epa.gov>]
Sent: Friday, August 16, 2013 1:56 PM
To: Zelen, Benjamin J

Schanilec, Kevin

From: Boyd, Andrew
Sent: Thursday, August 22, 2013 8:10 AM
To: Schanilec, Kevin
Subject: FW: Hanford CAFO Docket # RCRA-10-2013-0113

Confirmation received

From: Smith, Candace
Sent: Thursday, August 22, 2013 8:08 AM
To: Boyd, Andrew
Subject: RE: Hanford CAFO Docket # RCRA-10-2013-0113

Andy,

I never received a copy of the check, but Cincinnati Finance got the payment on 6/26/13 and closed the case for their purposes on 7/11/13. (see below)



Document Review

**Compass Document: NF
RCRA-10-2013-0113**

08/22/13

Document Summary: General Ledger Entries
Document: NF RCRA-10-2013-0113
SFO: CFC
Original Document Date: 06/26/13
Accounts Receivable Date: 06/26/2013
Amount: \$136,000.00
Collected: \$136,000.00
Closed: 07/11/13
Due From: U.S. DEPARTMENT OF ENERGY
Richland Operations Office
P.O. Box 550,
Richland, WA 99352
Due Date: 07/26/13
Title: RCRA-10-2013-0113
Comments:
Extended Description:
Overdue: 06/27/13 13 - NON-DELINQ. DUE < 1 YEAR
Interest: \$0.00
Handling: \$0.00
Penalty: \$0.00
Writeoff: \$0.00

Document Details:

Line	Charge Line	Charge Type	Line Amt	Collected	Writeoff	Closed	Int Rate	Reporting Categor
------	-------------	-------------	----------	-----------	----------	--------	----------	-------------------

Schanilec, Kevin

From: Jiles, Jordana
Sent: Wednesday, October 23, 2013 9:58 AM
To: Boller, Jack; Schanilec, Kevin
Subject: Hanford (WA7890008967), 10-2013-0113 items due

Good morning Jack and Kevin!

According to Hanford's (WA7890008967) Consent Agreement and Final Order (10-2013-0113), which was filed on 6/26/2013, the following (pages 7 & 8) should be completed by today, 10/23/13:

- b. Within 120 days of the effective date of the Final Order, Respondent shall submit to Ecology a permit modification request in accordance with WAC 173-303-830 for the units listed above in Paragraph 3.11 that includes a written closure plan that satisfies the closure plan requirements at WAC 173-303-610 or, in the event that one or more of the units is duly authorized by a permit for the treatment, storage, and/or disposal of dangerous waste within 120 days of the effective date of the Final Order, then Respondent shall submit a closure plan for those units to Ecology within 120 days of the effective date of the Final Order that satisfies applicable closure plan permit requirements. Respondent also must submit a copy of the closure plan submittals and all subsequent revisions to EPA.
- d. Within 120 days of the effective date of the Final Order, Respondent shall submit a written closure plan to Ecology for the 221T railroad tunnel TSD unit at T Plant and Building 2401W TSD unit at CWC that satisfies the closure plan requirements at 40 C.F.R. § 265.112, unless prior to the date that the closure plan is due, Ecology approves an extension pursuant to 40 C.F.R. § 265.112(d)(2), as incorporated and modified by WAC 173-303-400, upon a demonstration that the dangerous waste management unit has the capacity to receive additional dangerous wastes and that Respondent will continue to take all steps to prevent threats to human health and the environment, including compliance with all applicable requirements. Respondent also must submit a copy of the closure plan and all subsequent revisions to EPA.

Also, the three below were effective immediately:

- a. Respondent shall immediately cease the receipt of additional dangerous waste in the TSD units listed above in Paragraph 3.11 until such time as the treatment, storage, and/or disposal of dangerous waste in those units is duly authorized by a dangerous waste permit issued pursuant to WAC 173-303-800 through 173-303-840.
- c. Respondent shall immediately comply with all applicable final facility standards for the management of dangerous waste identified at WAC 173-303-600(1) for the units identified above in Paragraph 3.11 including, but not limited to, the following requirements: general waste analysis at WAC 173-303-300, security provisions at WAC 173-303-310, general inspections at WAC 173-303-320, personnel training at WAC 173-303-330, preparedness and prevention at WAC 173-303-340, contingency plan and emergency procedures at WAC 173-303-350, and use and management of containers at WAC 173-303-630. Respondent shall continue to comply with these requirements until closure of the units has been completed, or until the units become authorized under a permit for the treatment, storage, and/or disposal of dangerous waste in which case Respondent shall comply with the applicable permit requirements.
- e. Respondent must immediately cease the placement of prohibited dangerous waste in Trenches 31 and 34 without first satisfying applicable treatment standards in accordance with WAC 173-33-140.

Jo
x0309

Thanks

Ron Skinnarland

Waste Management Section Manager

Nuclear Waste Program

Washington Department of Ecology

Phone: (509) 372-7924

Email: rski461@ecy.wa.gov

FAX: (509) 372-7971

Schanilec, Kevin

From: Bartus, Dave
Sent: Monday, October 28, 2013 10:38 AM
To: Boyd, Andrew; Schanilec, Kevin
Subject: FYI - internal happenings at Ecology regarding incoming EPA CAFO submittals

Andy and Kevin:

For your reading pleasure. This was NOT explicitly sent to us, and I received it on an unsolicited basis, so please treat accordingly.

Dave

From: Skinnarland, Ron (ECY)
Sent: Thursday, October 24, 2013 12:52 PM
To: Alexander, Debra; Singleton, Deborah (ECY); Lowe, Steven (ECY); Skorska, Maria (ECY); Prignano, Andrea (ECY); Elsethagen, Kelly (ECY); Mathey, Jared W. (ECY); Conaway, Kathy (ECY); Dahl, Suzanne (ECY); Brown, Madeleine (ECY)
Cc: Hedges, Jane (ECY); Price, John (ECY); Whalen, Cheryl (ECY)
Subject: SWOC Permit Modification Phase I Process Begins

Team: The Department of Energy has delivered the closure plans and Part A's for the SWOC facilities.

Andrea and Deborah have adapted our Class 3 permit modification process to include assignments and schedule. Deborah will be sending this out shortly.

I have set up a meeting to get everyone together next Thursday morning.

In the meantime, I would like you to get started on your assigned work. Between now and our meeting on Thursday I would like you to:

For everyone – please review the assignment table and get back to Deborah if you have questions.

1. For the TSD unit group leads, (Steve Lowe for CWC/WRAP, Deb Alexander for Trench 31/34 and Trench 94, and Maria Skorska for T Plant):
 - Review the Rev 9 draft Part A, Training, Inspection and Closure Plan for your facility
 - Review the draft CAP's for Part A's, Training, Inspection and Closure
 - Review Energy's submitted Part A's, Training, Inspection and Closure plans for Phase I and prepare a written list of comments and questions and send it to Deborah to be put in a Sharepoint folder
2. For the CAP leads (Jared and Kathy) please do a high level review of the draft Permit modification Part A's, Training, Inspection and closure plans addenda and bring written comments to Thursday meeting.

Schanilec, Kevin

From: Bartus, Dave
Sent: Tuesday, October 29, 2013 12:31 PM
To: Schanilec, Kevin
Subject: RE: Energy's October 11 submission to EPA
Attachments: Addendum H-LLBG Closure Plan.pdf; 13-ESQ-0074.pdf; Addendum G_SWOC Closure Units.pdf; Addendum H_SWOC Closure Units.pdf; Addendum H-CWC-WRAP Closure Plan.pdf

Kevin:

I received the attached from Ecology through the Hanford SharePoint system. This doesn't resolve the problem of not having a deliverable directly from energy, but it does give us an advance start on the documents themselves.

You'll probably get multiple e-mails due to size...

Dave

From: Schanilec, Kevin
Sent: Tuesday, October 29, 2013 12:02 PM
To: cliff.clark@rl.doe.gov
Cc: Bartus, Dave
Subject: Energy's October 11 submission to EPA

Hi Cliff:

Per my voice mail of a few minutes ago, we are unable to locate the submission by Energy, apparently dated October 11, 2013, pursuant to the June 2013 RCRA CAFO. Can you confirm that a hard copy was sent to EPA? Hopefully it was sent by certified mail.

In any event, if an electronic copy of the submission is available, please forward that to me at your earliest convenience.

Thanks – Kevin

Kevin Schanilec
Senior Enforcement Engineer
EPA Region 10 (OCE-127)
1200 Sixth Avenue, Suite 900
Seattle, WA 98101
206-553-1061

Schanilec, Kevin

From: Bartus, Dave
Sent: Tuesday, October 29, 2013 12:35 PM
To: Schanilec, Kevin
Subject: RE: Energy's October 11 submission to EPA
Attachments: Addendum H-T-Plant Closure Plan.pdf

Second e-mail

From: Schanilec, Kevin
Sent: Tuesday, October 29, 2013 12:02 PM
To: cliff.clark@rl.doe.gov
Cc: Bartus, Dave
Subject: Energy's October 11 submission to EPA

Hi Cliff:

Per my voice mail of a few minutes ago, we are unable to locate the submission by Energy, apparently dated October 11, 2013, pursuant to the June 2013 RCRA CAFO. Can you confirm that a hard copy was sent to EPA? Hopefully it was sent by certified mail.

In any event, if an electronic copy of the submission is available, please forward that to me at your earliest convenience.

Thanks – Kevin

Kevin Schanilec
Senior Enforcement Engineer
EPA Region 10 (OCE-127)
1200 Sixth Avenue, Suite 900
Seattle, WA 98101
206-553-1061

Schanilec, Kevin

From: Bartus, Dave
Sent: Tuesday, October 29, 2013 12:36 PM
To: Schanilec, Kevin
Subject: RE: Energy's October 11 submission to EPA
Attachments: SWOC Part A Forms-T-Plant.pdf; Addendum I_SWOC Closure Units.pdf; SWOC Part A Forms-CWC.pdf; SWOC Part A Forms-LLBG.pdf

Third e-mail

From: Schanilec, Kevin
Sent: Tuesday, October 29, 2013 12:02 PM
To: cliff.clark@rl.doe.gov
Cc: Bartus, Dave
Subject: Energy's October 11 submission to EPA

Hi Cliff:

Per my voice mail of a few minutes ago, we are unable to locate the submission by Energy, apparently dated October 11, 2013, pursuant to the June 2013 RCRA CAFO. Can you confirm that a hard copy was sent to EPA? Hopefully it was sent by certified mail.

In any event, if an electronic copy of the submission is available, please forward that to me at your earliest convenience.

Thanks – Kevin

Kevin Schanilec
Senior Enforcement Engineer
EPA Region 10 (OCE-127)
1200 Sixth Avenue, Suite 900
Seattle, WA 98101
206-553-1061

Schanilec, Kevin

From: Bartus, Dave
Sent: Tuesday, October 29, 2013 12:37 PM
To: Schanilec, Kevin
Subject: RE: Energy's October 11 submission to EPA
Attachments: records review presentation.pdf; FS-1 closure presentation.pdf; LLBG Closure Plan_Attachment A.pdf; LLBG Closure Plan_Attachment B.pdf; LLBG Trenches 31-34-94 FS-1 Closure Plan_DRAFT.pdf

Fourth e-mail.

From: Schanilec, Kevin
Sent: Tuesday, October 29, 2013 12:02 PM
To: cliff.clark@rl.doe.gov
Cc: Bartus, Dave
Subject: Energy's October 11 submission to EPA

Hi Cliff:

Per my voice mail of a few minutes ago, we are unable to locate the submission by Energy, apparently dated October 11, 2013, pursuant to the June 2013 RCRA CAFO. Can you confirm that a hard copy was sent to EPA? Hopefully it was sent by certified mail.

In any event, if an electronic copy of the submission is available, please forward that to me at your earliest convenience.

Thanks – Kevin

Kevin Schanilec
Senior Enforcement Engineer
EPA Region 10 (OCE-127)
1200 Sixth Avenue, Suite 900
Seattle, WA 98101
206-553-1061

Thank you very much,

Steve Lowe, PE
Washington State Department of Ecology
Nuclear Waste Program
3100 Port of Benton Blvd
Richland, WA 99354-1670
(509) 372-7894 [office]
(509) 521-0559 [cell]
slow461@ecy.wa.gov

Ecology Publication 95-402

Section D2.2

Traffic flow and staging areas

Describe equipment, procedures, and routes for transferring containers to and between storage units and for moving and managing waste containers within units. Also describe areas used to prepare containers for placement into storage or into a treatment or recycling process (sometimes called staging areas).

[Note: staging areas must be designed and maintained to the same standards as storage areas.]

Capacity

Provide the maximum number, volume (i.e., capacity), and stacking height of containers for each area in which containers are stored or staged and indicate the volume of the largest container that will be held in the area. For staging areas, describe time limits (usually, no more than 24 hours) for holding containers in the area. Provide a diagram (or diagrams) or description showing the stacking pattern(s) for containers, including the stacking arrangements for the various sizes of containers and types of dangerous wastes that will be stored in the container storage area(s).

Section D2.4.2

Provide design and profile drawings of the existing and/or planned container storage and staging area(s), showing the secondary containment system(s). Include design parameters, dimensions, and materials of construction.

Section F2.1

Areas subject to spills such as load/unloading areas, transferring area, staging areas, storage areas, processing areas and treatment areas must be inspected daily when in use.

of new dangerous waste management units at Hanford as a change under interim status), nor a permit modification request to create new dangerous waste management units (such as a temporary placement area NOT contiguous with a dangerous waste management units operating under Permit Condition I.A.1.

I would note that it is my understanding that during EPA/DOE-RL CAFO negotiations that EPA did indicate that where there are load/unload areas immediately adjacent to existing dangerous waste management units operating under Permit Condition I.A.1 (legal units), to the extent that there is uncertainty in the exact extent of the dangerous waste management units, update to the corresponding section of Part A of the permit application is an acceptable means of clarifying the physical extent of each dangerous waste management unit. EPA did NOT say that new dangerous waste management units could receive authorization by simply identifying them in a revised Part A form submittal.

I did see Kerry's response as I was drafting this, and generally agree with all of her points. I didn't do a side-by-side comparison of our respective responses, so to the extent that there may be unresolved questions, I'd be more than happy to further engage in the discussions via e-mail, or via a conference call.

Bottom line: Staging/temporary storage areas need to be clearly documented and authorized subject to robust permit requirements.

Dave

From: Lowe, Steven (ECY) [mailto:slow461@ECY.WA.GOV]
Sent: Friday, November 22, 2013 8:00 AM
To: Graber, Kerry (ECY); Bartus, Dave
Cc: Skinnarland, Ron (ECY); Singleton, Deborah (ECY)
Subject: Question re. Permitting of Areas Used for Temporary Waste Placement
Importance: High

Kerry and Dave,

I'm looking for a "company position" from both of you please.

We are reviewing the revised Part A forms for the SWOC facilities that were submitted with the EPA CAFO closure plans. In going over comments with DOE and their contractor yesterday, a question came up regarding the permitting of areas used for the temporary placement of waste. For the SWOC facilities, these areas are all outside and include uncovered asphalt areas used for loading and unloading waste, and for setting waste containers which are waiting to be processed or simply need to be out of the way while performing other operations. Some of these areas are NOT contiguous to a waste management unit. The revised SWOC Part A forms now show these areas as permitted container storage areas (S01 process code). My objection is that implies the waste may be there longer than just temporarily and opens the door for long-term outdoor storage of containers whose contents may be uncertain (particularly in light of the unexpected drum leaks on 11/14 and 11/22). DOE insists they received verbal guidance from EPA Legal to the effect that they were told these were considered to be container storage areas. As this was undocumented, my management in all their wisdom(?) tasked me with trying to substantiate it.

The updated Ecology Publication 95-402 (dated October 2013) on preparing permit applications seems to refer to these as "staging areas" and distinct from "storage areas". You can see the excerpts I've attached below. I happen to prefer the staging areas term and its connotation, but it doesn't appear to be captured in the regs anywhere.

So given all that, do we have a position on the use of these areas and how they should be permitted? Are these indeed container storage areas? If so, it would seem to behoove us to establish limits on their design and use by way of permit conditions. Perhaps these conditions could take the form of providing secondary containment, a 24 hr time limit or to the end of the shift or even always having someone be present, and daily inspections when in use. Whatever is acceptable to HWTR and EPA I'm happy to go with.

Schanilec, Kevin

From: Bartus, Dave
Sent: Friday, November 22, 2013 4:11 PM
To: Lowe, Steven (ECY); Graber, Kerry (ECY)
Cc: Skinnarland, Ron (ECY); Singleton, Deborah (ECY); McArthur, Lisa; Boyd, Andrew; Schanilec, Kevin
Subject: RE: Question re. Permitting of Areas Used for Temporary Waste Placement

Thanks, Steve, for this summary.

To start, I'll make reference to the EPA comments on the CWC permit chapter Addendum C and the corresponding conceptual resolution of these various comments.

There are a couple of themes in these comments. First, any areas where containers are "managed" subsequent to a point of generation and any accumulation in a satellite or generator accumulation (<90 day) area constitutes storage and must be authorized through the permit (at Hanford, this includes units with explicit permit conditions and units legitimately operating under Permit Condition I.A.1). The only exception to this is the provisions of WAC 173-303-395(4), which on the face of it, applies to facilities that receive or ship manifested loads of liquid dangerous wastes. So, this notion that "temporary placement of waste" can occur in other than permitted storage areas has no basis in the regulations. Second, the draft permit suggests that these areas for "temporary placement of waste" are inherently necessary based on existing waste management activities. See, for example, the discussion in Section C.1.4 in the CWC permit chapter of the draft permit. EPA has provided specific comments on the validity of these proposed justifications for temporary placement of containers outside of dangerous waste management units, both with respect to the draft permit and earlier versions of permit application and permit addendum language.

I completely agree with your concerns regarding the length of storage. While it is conceptually possible to have modified standards (less stringent standards) for wastes that remain in these temporary areas for shorter amounts of time, I think there are two fundamental problems in doing so. First, how would the time that a container remains in a temporary storage area be tracked and enforced? It seems to me that the overhead for this would be substantial, and probably take as much time as the containers would remain in temporary storage. Second, this temporary storage is "high risk," in the sense that accidents are most likely to happen when containers are being moved in and out, not while they are simply passively being stored. On this grounds, I would argue that it is absolutely essential that both unit and management standards be at least as robust as the "traditional" storage units from which wastes are being moved. Quite honestly, my personal (if not EPA) perspective is more focus needs to be placed on sound, robust and defensible management standards rather than finding ways to avoid them through concepts such as temporary storage, load/unload areas. Any consideration of these special circumstances really needs to be based on a comprehensive need to critically review the entire waste management pathway, both to ensure there is a defensible basis technically and under the rules for exceptions, and to figure out what sort of risks need to be addressed.

Finally, I would raise the question of how Ecology is going to address elements of the EPA CAFO Part A submissions.

These Part A forms identify a number of additional dangerous waste management units other than those subject to closure pursuant to the EPA CAFO. Ecology needs to clearly document what effect inclusion of the submitted Part A forms into Addendum A of the new permit chapters where the EPA CAFO closure plans will reside will have on dangerous waste management units identified in the Part A forms other than the closing dangerous waste management units. Quite frankly, there does not seem any clear rationale or regulatory basis to include Part A forms addressing units otherwise operating pursuant to Permit Condition I.A.1 into the permit – if nothing else, this is a complete departure from the long-standing practice of keeping documentation of units authorized under Permit Condition I.A.1 outside of the permit. Doing so in this instance will create a significant inconsistency in how Permit Condition I.A.1 is interpreted and applied, adding even further confusion as to how this condition is interpreted and applied. One thing EPA can say for certain is that the Part A submissions under the EPA CAFO do NOT constitute a change under interim status (which might be permissible under the NWP's Hanford Interim Status Policy, should this policy be interpreted to allow creation

Schanilec, Kevin

From: Bartus, Dave
Sent: Tuesday, November 26, 2013 12:08 PM
To: Singleton, Deborah (ECY); Prignano, Andrea (ECY); Eberlein, Elis (ECY)
Cc: McArthur, Lisa; Schanilec, Kevin
Subject: Follow-up from today's call

Thank you very much for our earlier conversation concerning coordination of EPA and Ecology review of the 10/24 submissions pursuant to the EPA CAFO.

As a follow-up, I was wondering if you could share with EPA the set of consolidated comments Ecology sent to DOE-RL on the initial draft of the Trench 31/34 FS-1 storage area closure plan. My records indicate I sent EPA comments on this advance submission on 8/16/2013, but I don't recall ever having seen whatever consolidated comments Ecology sent to DOE-RL. This information would be very helpful for both EPA and Ecology to evaluate the degree to which DOE-RL was responsive in their final 10/24 submission to early EPA and Ecology comments.

Thanks!

Dave

Schanilec, Kevin

From: Bartus, Dave
Sent: Tuesday, November 26, 2013 1:01 PM
To: Prignano, Andrea (ECY); Singleton, Deborah (ECY)
Cc: McArthur, Lisa; Schanilec, Kevin
Subject: Hanford CWC outdoor storage area closure issue
Attachments: Example Calculations.docx

All:

As I've alluded to in informal discussions of the CWC outdoor storage area closure plan submitted on 10/24 pursuant to the EPA CAFO, there is an issue of sampling design that needs to be discussed. As you know, the draft closure plan for this dangerous waste management unit proposes a sampling grid with a total of 20 samples (See Table 3.1 in the CWC outdoor storage unit closure plan).

Based on the premise that if there were spills or releases in the CWC outdoor storage area, their distribution would be best described as "hot spots." According to Ecology's clean closure guidance document (Ecology publication #94-111), Ecology recommends that sampling design in these circumstances be carried out as recommended by Gilbert (See the references section in the clean closure guidance document). I've taken the liberty to do sample calculations for large boxes typically stored in the CWC outdoor storage area. Based on these calculations, attached, a total of 3,818 samples would be required based on an assumed probability of 5% of not finding a hot spot that actually exists ($\beta=0.05$ in the calculations). Obviously, there is a very significant difference in the number of samples required depending on the assumptions one makes as to what distribution best characterizes spills/releases.

Dave

As Tom Cusack and I discussed by phone on Tuesday, putting items into a DWMU without clean closing it brings into question the 'cleanliness' of everything put into the DWMU. It might not be against the regulations, but is a very bad practice. Everything stored in the DWMU would need to be proven clean.

Phil

L:\Projects\Waste Management Project\SWOC and Burial Grounds\SWOC Closure Plans\Oct 24 SWOC Closure Plans Submittal\14-ESC-0003 Additional T Plant Closure Plans

(C) Closure of the dangerous waste management unit or facility would be incompatible with continued operation of the site.

To be sure, any closure requirement that Ecology may elect to establish as a permit requirement must be protective of human health and the environment. That said, the assertion that the 221-T R5 Waste Storage Area is in a safe configuration for an extended closure period does NOT satisfy any of the criterion that provide Ecology authority to authorize additional time for completion of closure.

Further, the 221-T R5 Waste Storage Area does NOT have any physical closure actions that need to be done in conjunction with the physical disposition actions in the facility. Any proposal on the part of the facility to delay clean closure verification sampling until commencement of CDI activities appears to be solely on the basis of convenience, not of necessity.

Finally, the entire point of the EPA CAFO to require submission of a closure plan, and to implement such requirement once established as enforceable requirements of the Hanford permit, is to cease the unauthorized/illegal activities as soon as possible. Deferral of clean closure verification sampling until the commencement of CDI activities at an unspecified date in time is fundamentally incompatible with this objective.

In light of the above, the closure plan has NOT provided any acceptable basis for additional time allowed for closure pursuant to WAC 173-303-610(4)(b)(ii).

Hope these thoughts help. Feel free to share internal to Ecology (but NOT to DOE-RL or contractors) as you see fit.

Dae

From: Conaway, Kathy (ECY) [mailto:KCON461@ECY.WA.GOV]

Sent: Wednesday, December 11, 2013 6:03 PM

To: Boller, Jack; Bartus, Dave

Subject: FW: repurposing of building

Phil talked with me today on this. He has been helping out in the review of the EPA enf closure plans. It appears that CHPRC/DOE have decided to use some of these closure units for "equipment storage" instead of closing them now. You have a copy of these closure plans, right? Are you OK with this approach?

From: Gent, Philip (ECY)

Sent: Wednesday, December 11, 2013 8:12 AM

To: Conaway, Kathy (ECY)

Cc: Singleton, Deborah (ECY); Adams, Andrea (ECY); Elsethagen, Kelly (ECY); Lowe, Steven (ECY); Skorska, Maria (ECY); Cusack, Thomas (ECY)

Subject: repurposing of building

Kathy,

Per your request.

The closure plans submitted by DOE for the extra T-Plant Complex DWMU is saved at the location shown below. Section I3.2 is the section talking about using the DWMU for equipment and material storage (page 217 of 293 using the PDF page counter). Additionally, DOE plans on closing the DWMU as part of the Canyon Building closure shown in I1.1 (page 214 of 293 using the PDF page counter). Thus, the DWMU won't be clean closed until sometime in the future, but it would be used for material and equipment storage.

Schanilec, Kevin

From: Bartus, Dave
Sent: Wednesday, December 11, 2013 6:54 PM
To: Conaway, Kathy (ECY); Boller, Jack
Cc: Schanilec, Kevin
Subject: RE: repurposing of building

I'm copying Kevin, as he has lead EPA responsibilities for decision-making with regard to compliance with EPA CAFO requirements.

This sounds painfully like having a card table and office chairs in one of the T-Plant "cage" units, or the 2401-W building, similarly used for equipment storage without closing the building. On the face of it, it appears that DOE-RL didn't get the memo (or the enforcement action) that clearly made the point that this practice is not acceptable. More specifically, see Count 2 and paragraph 3.13 in the EPA CAFO.

As far as I know, there are no provisions in the dangerous waste regulations that allow use of a dangerous waste management unit for non-waste management activities until completion of closure (that is, the facility submits certification of completion of closure according to the approved closure plan to Ecology). There are provisions at WAC 173-303-610(3)(c)(ii) that allow an extension to the date the facility expects to begin closure (WAC 173-303-610(3)(c)(ii), the so-called "delay of closure" provision. The EPA CAFO included provisions for exercise, and DOE-RL did in fact take advantage of the cited authority with respect to the T-Plant railroad tunnel. See 13-AMRP-0311 dated September 26, 2013.) This provision requires Ecology approval – it is neither automatic nor self-implementing. There are also provisions under -610(4)(a) and (b) that provide for additional time to complete closure once closure has begun. However, these provisions would not apply to are essentially predicated on continued or future waste management activities, and to not appear to anticipate non-waste management activities, such as equipment or material storage.

I'm not sure what the page references in Phil's e-mail below are, as the T-plant closure plan seems to have far more than 293 pages. However, I did see similar text in the closure plan text applicable to the 271-T Cage, cited below:

A3.2 Removal of Wastes and Waste Residues

34 The 271-T Cage does not currently manage dangerous, mixed, or TSCA-PCB waste. The 271-T Cage
35 serves as an equipment and material storage area. Waste management records indicate that dangerous,
36 mixed, and TSCA-PCB waste has been previously managed in the 271-T Cage under <90-day and SAA
37 storage. The 271-T Cage will no longer be used for dangerous, mixed, or TSCA-PCB waste management;
38 however, the 271-T Cage will be used for equipment and materials storage. The 271-Cage is in a safe
39 configuration and will be tracked in WIDS until verification sampling is performed under the SAP.

Bottom line – this language does not reflect compliance with WAC 173-303-610 for contents of the closure plan.

The T-plant closure plan requests additional time to complete closure activities (specifically, sampling and analysis to verify compliance with concentration-based closure performance standards) so as to coordinate closure verification sampling with future Canyon Disposition Initiative (CDI) activities. From my perspective (and I hope Ecology's) this is not acceptable. Here is the comment I've drafted for the R5 storage area:

The criteria at WAC 173-303-610(4)(b)(i) are as follows:

The partial or final closure activities will, of necessity, take longer than one hundred eighty days to complete; or
(ii)(A) The dangerous waste management unit or facility has the capacity to receive additional dangerous wastes, or has the capacity to receive non-dangerous wastes if the owner or operator complies with (d) and (e) of this subsection;
(B) There is reasonable likelihood that he or another person will recommence operation of the dangerous waste management unit or the facility within one year; and

Schanilec, Kevin

From: Boller, Jack
Sent: Thursday, December 12, 2013 7:38 AM
To: Schanilec, Kevin
Cc: Bartus, Dave
Subject: FW: repurposing of building

Kevin, Here is info from Kathy regarding DOE wishes for closure of the SWOC units under our CAFO.

From: Conaway, Kathy (ECY) [mailto:KCON461@ECY.WA.GOV]
Sent: Wednesday, December 11, 2013 6:03 PM
To: Boller, Jack; Bartus, Dave
Subject: FW: repurposing of building

Phil talked with me today on this. He has been helping out in the review of the EPA enf closure plans. It appears that CHPRC/DOE have decided to use some of these closure units for "equipment storage" instead of closing them now. You have a copy of these closure plans, right? Are you OK with this approach?

From: Gent, Philip (ECY)
Sent: Wednesday, December 11, 2013 8:12 AM
To: Conaway, Kathy (ECY)
Cc: Singleton, Deborah (ECY); Adams, Andrea (ECY); Elsethagen, Kelly (ECY); Lowe, Steven (ECY); Skorska, Maria (ECY); Cusack, Thomas (ECY)
Subject: repurposing of building

Kathy,

Per your request.

The closure plans submitted by DOE for the extra T-Plant Complex DWMU is saved at the location shown below. Section I3.2 is the section talking about using the DWMU for equipment and material storage (page 217 of 293 using the PDF page counter). Additionally, DOE plans on closing the DWMU as part of the Canyon Building closure shown in I1.1 (page 214 of 293 using the PDF page counter). Thus, the DWMU won't be clean closed until sometime in the future, but it would be used for material and equipment storage.

As Tom Cusack and I discussed by phone on Tuesday, putting items into a DWMU without clean closing it brings into question the 'cleanliness' of everything put into the DWMU. It might not be against the regulations, but is a very bad practice. Everything stored in the DWMU would need to be proven clean.

Phil

L:\Projects\Waste Management Project\SWOC and Burial Grounds\SWOC Closure Plans\Oct 24 SWOC Closure Plans Submittal\14-ESC-0003 Additional T Plant Closure Plans

To: Conaway, Kathy (ECY)

Cc: Singleton, Deborah (ECY); Adams, Andrea (ECY); Elsethagen, Kelly (ECY); Lowe, Steven (ECY); Skorska, Maria (ECY); Cusack, Thomas (ECY)

Subject: repurposing of building

Kathy,

Per your request.

The closure plans submitted by DOE for the extra T-Plant Complex DWMU is saved at the location shown below. Section I3.2 is the section talking about using the DWMU for equipment and material storage (page 217 of 293 using the PDF page counter). Additionally, DOE plans on closing the DWMU as part of the Canyon Building closure shown in I1.1 (page 214 of 293 using the PDF page counter). Thus, the DWMU won't be clean closed until sometime in the future, but it would be used for material and equipment storage.

As Tom Cusack and I discussed by phone on Tuesday, putting items into a DWMU without clean closing it brings into question the 'cleanliness' of everything put into the DWMU. It might not be against the regulations, but is a very bad practice. Everything stored in the DWMU would need to be proven clean.

Phil

L:\Projects\Waste Management Project\SWOC and Burial Grounds\SWOC Closure Plans\Oct 24 SWOC Closure Plans Submittal\14-ESC-0003 Additional T Plant Closure Plans

37 storage. The 271-T Cage will no longer be used for dangerous, mixed, or TSCA-PCB waste management;
38 however, the 271-T Cage will be used for equipment and materials storage. The 271-Cage is in a safe
39 configuration and will be tracked in WIDS until verification sampling is performed under the SAP.

Bottom line – this language does not reflect compliance with WAC 173-303-610 for contents of the closure plan.

The T-plant closure plan requests additional time to complete closure activities (specifically, sampling and analysis to verify compliance with concentration-based closure performance standards) so as to coordinate closure verification sampling with future Canyon Disposition Initiative (CDI) activities. From my perspective (and I hope Ecology's) this is not acceptable. Here is the comment I've drafted for the R5 storage area:

The criteria at WAC 173-303-610(4)(b)(i) are as follows:

The partial or final closure activities will, of necessity, take longer than one hundred eighty days to complete; or
(ii)(A) The dangerous waste management unit or facility has the capacity to receive additional dangerous wastes, or has the capacity to receive non-dangerous wastes if the owner or operator complies with (d) and (e) of this subsection;
(B) There is reasonable likelihood that he or another person will recommence operation of the dangerous waste management unit or the facility within one year; and
(C) Closure of the dangerous waste management unit or facility would be incompatible with continued operation of the site.

To be sure, any closure requirement that Ecology may elect to establish as a permit requirement must be protective of human health and the environment. That said, the assertion that the 221-T R5Waste Storage Area is in a safe configuration for an extended closure period does NOT satisfy any of the criterion that provide Ecology authority to authorize additional time for completion of closure.

Further, the 221-T R5 Waste Storage Area does NOT have any physical closure actions that need to be done in conjunction with the physical disposition actions in the facility. Any proposal on the part of the facility to delay clean closure verification sampling until commencement of CDI activities appears to be solely on the basis of convenience, not of necessity.

Finally, the entire point of the EPA CAFO to require submission of a closure plan, and to implement such requirement once established as enforceable requirements of the Hanford permit, is to cease the unauthorized/illegal activities as soon as possible. Deferral of clean closure verification sampling until the commencement of CDI activities at an unspecified date in time is fundamentally incompatible with this objective.

In light of the above, the closure plan has NOT provided any acceptable basis for additional time allowed for closure pursuant to WAC 173-303-610(4)(b)(ii).

Hope these thoughts help. Feel free to share internal to Ecology (but NOT to DOE-RL or contractors) as you see fit.

Dae

From: Conaway, Kathy (ECY) [<mailto:KCON461@ECY.WA.GOV>]
Sent: Wednesday, December 11, 2013 6:03 PM
To: Boller, Jack; Bartus, Dave
Subject: FW: repurposing of building

Phil talked with me today on this. He has been helping out in the review of the EPA enf closure plans. It appears that CHPRC/DOE have decided to use some of these closure units for "equipment storage" instead of closing them now. You have a copy of these closure plans, right? Are you OK with this approach?

From: Gent, Philip (ECY)
Sent: Wednesday, December 11, 2013 8:12 AM

Schanilec, Kevin

From: Schanilec, Kevin
Sent: Thursday, December 12, 2013 9:41 AM
To: Bartus, Dave; Conaway, Kathy (ECY); Boller, Jack
Subject: RE: repurposing of building

Agree – if they themselves admit there will no longer be DW stored anywhere, the closure regs say they have to commence closure within 90 days of the last receipt of DW. Since June 2013 was the latest date at which any DW was received (assuming they are following the CAFO requirements), closure should start immediately.

Kevin

Kevin Schanilec
Senior Enforcement Engineer
EPA Region 10 (OCE-127)
1200 Sixth Avenue, Suite 900
Seattle, WA 98101
206-553-1061

From: Bartus, Dave
Sent: Wednesday, December 11, 2013 6:54 PM
To: Conaway, Kathy (ECY); Boller, Jack
Cc: Schanilec, Kevin
Subject: RE: repurposing of building

I'm copying Kevin, as he has lead EPA responsibilities for decision-making with regard to compliance with EPA CAFO requirements.

This sounds painfully like having a card table and office chairs in one of the T-Plant "cage" units, or the 2401-W building, similarly used for equipment storage without closing the building. On the face of it, it appears that DOE-RL didn't get the memo (or the enforcement action) that clearly made the point that this practice is not acceptable. More specifically, see Count 2 and paragraph 3.13 in the EPA CAFO.

As far as I know, there are no provisions in the dangerous waste regulations that allow use of a dangerous waste management unit for non-waste management activities until completion of closure (that is, the facility submits certification of completion of closure according to the approved closure plan to Ecology). There are provisions at WAC 173-303-610(3)(c)(ii) that allow an extension to the date the facility expects to begin closure (WAC 173-303-610(3)(c)(ii), the so-called "delay of closure" provision. The EPA CAFO included provisions for exercise, and DOE-RL did in fact take advantage of the cited authority with respect to the T-Plant railroad tunnel. See 13-AMRP-0311 dated September 26, 2013.) This provision requires Ecology approval – it is neither automatic nor self-implementing. There are also provisions under -610(4)(a) and (b) that provide for additional time to complete closure once closure has begun. However, these provisions would not apply to are essentially predicated on continued or future waste management activities, and to not appear to anticipate non-waste management activities, such as equipment or material storage.

I'm not sure what the page references in Phil's e-mail below are, as the T-plant closure plan seems to have far more than 293 pages. However, I did see similar text in the closure plan text applicable to the 271-T Cage, cited below:

A3.2 Removal of Wastes and Waste Residues

34 The 271-T Cage does not currently manage dangerous, mixed, or TSCA-PCB waste. The 271-T Cage
35 serves as an equipment and material storage area. Waste management records indicate that dangerous,
36 mixed, and TSCA-PCB waste has been previously managed in the 271-T Cage under <90-day and SAA

Please see the attached file for my comments for the five T-Plant CAFO DWMUs Closure Plans. Some of the issues associated with these Closure Plans are that:

- There are no schedules with dates, only cartoons illustrating the order of proposed activities.
- The plans propose “extended closure” where any sampling of the structures and pads would not be performed until the ultimate closure of the T-Plant complex.
- There appears to be an implicit assumption that all pads and structures are clean and no provisions are included for sampling of soils in the vicinity of or under the pads, even if sampling of the pads should result in finding of extensive contamination.

Thank you.

Maria (Marysia) Skorska, PhD, PE
Nuclear Waste Program
Washington Department of Ecology
Richland, WA
(509) 372-7891

- (ii)(A) The dangerous waste management unit or facility has the capacity to receive additional dangerous wastes, or has the capacity to receive non-dangerous wastes if the owner or operator complies with (d) and (e) of this subsection;
- (B) There is reasonable likelihood that he or another person will recommence operation of the dangerous waste management unit or the facility within one year; and
- (C) Closure of the dangerous waste management unit or facility would be incompatible with continued operation of the site.

To be sure, any closure requirement that Ecology may elect to establish as a permit requirement must be protective of human health and the environment. That said, the assertion that the 221-T RF Waste Storage Area is in a safe configuration for an extended closure period does NOT satisfy any of the criterion that provide Ecology authority to authorize additional time for completion of closure.

Further, the 221-T R5 Waste Storage Area does NOT have any physical closure actions that need to be done in conjunction with the physical disposition actions in the facility. Any proposal on the part of the facility to delay clean closure verification sampling until commencement of CDI activities appears to be solely on the basis of convenience, not of necessity.

Finally, the entire point of the EPA CAFO to require submission of a closure plan, and to implement such requirement once established as enforceable requirements of the Hanford permit, is to cease the unauthorized/illegal activities as soon as possible. Deferral of clean closure verification sampling until the commencement of CDI activities at an unspecified date in time is fundamentally incompatible with this objective.

In light of the above, the closure plan has NOT provided any acceptable basis for additional time allowed for closure pursuant to WAC 173-303-610(4)(b)(ii).

I have also developed a comment pertaining to language, again in the R5 section, reading:

The strategy for the entire T-Plant Complex is a coordinated closure for both the RCRA closing units and the CDI activities.

My corresponding comment is:

At least as currently understood, the CERCLA decision for final disposition of the 221-T canyon facility will not include requirements for closure of any dangerous/mixed waste storage units. Closure requirements must be established in the permit, not in the CERCLA CDI decision document.

Further, closure of the T-plant dangerous waste management units (the R5 unit, the 271-T cage, etc.) do NOT involve removal of structural components, nor are they located within the physical structure of the large processing facilities (e.g., the 221-T building), nor is it necessary (as opposed to merely convenient) to conduct physical closure actions in conjunction with the canyon facility structure. Therefore, citation of TPA Section 6.1 as the basis for approval of additional time to complete closure activities (WAC 173-303-610(4)(b)(ii)) is not defensible.

These comments haven't been reviewed internally, so they may change, but I think they are sufficiently defensible to share for discussion purposes.

Dave

From: Skorska, Maria (ECY) [<mailto:mako461@ECY.WA.GOV>]

Sent: Wednesday, December 11, 2013 5:40 PM

To: Skinnarland, Ron (ECY); Singleton, Deborah (ECY); Alexander, Debra (ECY)

Cc: Skorska, Maria (ECY); Conaway, Kathy (ECY); Prignano, Andrea (ECY); Dahl, Suzanne (ECY); Gent, Philip (ECY); Graber, Kerry (ECY); Bartus, Dave; Fearon, Lee (ECY)

Subject: Comments on T-Plant CAFO DWMUs Closure Plans

Schanilec, Kevin

From: Bartus, Dave
Sent: Thursday, December 12, 2013 11:36 AM
To: Skorska, Maria (ECY)
Cc: Schanilec, Kevin
Subject: RE: Comments on T-Plant CAFO DWMUs Closure Plans

You are more than welcome – I'm glad the thoughts are helpful.

I think EPA and Ecology are quickly approaching the time where it is appropriate to start more formally comparing notes, developing a strategic plan for finalizing comments, developing a communications strategy, and so on. I'm wondering if setting up a conference call with Kevin, myself, and appropriate Ecology folks sometime next week.

Thoughts?

Dave

From: Skorska, Maria (ECY) [mailto:msko461@ECY.WA.GOV]
Sent: Thursday, December 12, 2013 9:10 AM
To: Bartus, Dave
Subject: FW: Comments on T-Plant CAFO DWMUs Closure Plans

Hi Dave!

Thank you so very much for the quick feedback! It is very helpful and greatly appreciated, as it will help to focus our internal discussions scheduled for later today.

Maria

Maria (Marysia) Skorska, PhD, PE
Nuclear Waste Program
Washington Department of Ecology
Richland, WA
(509) 372-7891

From: Bartus, Dave [mailto:Bartus.Dave@epa.gov]
Sent: Wednesday, December 11, 2013 7:46 PM
To: Skorska, Maria (ECY); Skinnarland, Ron (ECY); Singleton, Deborah (ECY); Alexander, Debra (ECY)
Cc: Conaway, Kathy (ECY); Prignano, Andrea (ECY); Dahl, Suzanne (ECY); Gent, Philip (ECY); Graber, Kerry (ECY); Fearon, Lee (ECY)
Subject: RE: Comments on T-Plant CAFO DWMUs Closure Plans

Thanks kindly, Maria. I'm still working on compiling my comments on the T-Plant dangerous waste management unit closure requirements, and hope to have them available as soon as possible.

I completely agree with your summary issues in your e-mail below. Here is the specific comment I've drafted – it is specific to the T-Plant R5 unit.

The criteria at WAC 173-303-610(4)(B)(i) are as follows:

The partial or final closure activities will, of necessity, take longer than one hundred eighty days to complete; or

Schanilec, Kevin

From: Skorska, Maria (ECY) [msko461@ECY.WA.GOV]
Sent: Thursday, December 12, 2013 4:37 PM
To: Bartus, Dave
Cc: Schanilec, Kevin; Prignano, Andrea (ECY); Singleton, Deborah (ECY); Skinnarland, Ron (ECY)
Subject: RE: Comments on T-Plant CAFO DWMUs Closure Plans

Great idea; we will try to set it up for the next week.

Thank you.

Maria

Maria (Marysia) Skorska, PhD, PE
Nuclear Waste Program
Washington Department of Ecology
Richland, WA
(509) 372-7891

From: Bartus, Dave [mailto:Bartus.Dave@epa.gov]
Sent: Thursday, December 12, 2013 11:36 AM
To: Skorska, Maria (ECY)
Cc: Schanilec, Kevin
Subject: RE: Comments on T-Plant CAFO DWMUs Closure Plans

You are more than welcome – I'm glad the thoughts are helpful.

I think EPA and Ecology are quickly approaching the time where it is appropriate to start more formally comparing notes, developing a strategic plan for finalizing comments, developing a communications strategy, and so on. I'm wondering if setting up a conference call with Kevin, myself, and appropriate Ecology folks sometime next week.

Thoughts?

Dave